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Counsel for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

CLIVEN D. BUNDY,

Defendant.

CASE NO.: 2:16-cr-00046-GMN-PAL-1

DEFENDANT CLIVEN D. BUNDY'S
MOTION FOR EXTENSION OF TIME
FOR THE FILING OF REPLIES TO
DOCS. 984 AND 985

Defendant, CLIVEN D. BUNDY, by and through his counsel, Bret O. Whipple, Esq., of Justice Law Center, hereby moves this Court for an extension of time for the filing of replies to Docs 984 and 985.

Defendant notes that the United States ultimately had from October 17, 2016 until November 16, 2016 to file their response(s) to the Defendant's Motions, and Defendant did not object (and does not object) to the continuance granted to the United States in Order 936. Undersigned counsel has reached out to the United States to attempt to stipulate to the present request on this morning of November 22, 2016. Undersigned counsel has received an e-mail from the United States indicating that they do not oppose this requested continuance.

Undersigned counsel has been in trial in the Eighth Judicial District Court of the State of Nevada in Case C-11-273560-2 (State of Nevada v. Coache) since November 7, 2016. *See* Exhibit A, Case Docket Sheet. Trial is scheduled to end this week with closing statements expected to be given today November 22, 2016. As such, undersigned counsel has either been in trial or, on the weekends, preparing for the upcoming witnesses throughout the last two weeks.

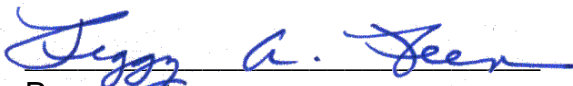
While undersigned counsel appreciates that this Court must adjudicate the motions in a timely matter, he respectfully requests a brief (unopposed) continuance extending the reply deadline as to Documents 984-985 until this upcoming Monday November 28, 2016.

DATED this 22nd day of November, 2016.

JUSTICE LAW CENTER

/S/ Bret O. Whipple
Bret O. Whipple, Esq.
Nevada Bar No. 6168
1100 S. Tenth Street
Las Vegas, Nevada 89104

IT IS SO ORDERED this 22nd day
of November, 2016.


Peggy A. Leen
United States Magistrate Judge

CERTIFICATION OF SERVICE

I hereby certify that on the 22nd day of November, 2016, a true and correct copy of the foregoing Motion for Extension of Time was delivered via E-filing to:

DANIEL BOGDEN
United States Attorney

STEVEN MYHRE
First Assistant United States Attorney

NICHOLAS DICKINSON
Assistant United States Attorney

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/S/ Tatum Wehr
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